

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEBBIE ANN BROMFIELD-THOMPSON,

Plaintiff,

v.

AMERICAN UNIVERSITY OF
ANTIGUA/MANIPAL EDUCATION
AMERICAS, LLC A/K/A GCLR, LLC, AND
NBME,

Defendants.

Civil Case No.: 19-CV-6078

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE THAT, upon the accompanying (a) Memorandum of Law in Support of the Joint Motion to Dismiss of Defendants American University of Antigua (“AUA”) and Manipal Education Americas, LLC (“MEA”); (b) the Declaration of Vernon Solomon; (c) the Declaration of Anita O’Brien; and (d) the Declaration of Amina Hassan, with accompanying exhibits, and all the prior pleadings and proceedings in this action, defendants AUA and MEA will move this Court, pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(5), and 12(b)(6), before the Honorable Jesse M. Furman at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order granting AUA’s and MEA’s Motion to Dismiss, and dismissing Plaintiff’s First Amended Complaint in this action (ECF 45) in its entirety as to defendants AUA and MEA, and for such other relief as the Court deems just and proper.

Dated: New York, New York
February 4, 2020

Respectfully submitted,

HUGHES HUBBARD & REED LLP

By: /s/ Robb W. Patryk

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Americas, LLC and American University of Antigua